UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK 21 MC 102 (AKH) IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION ROSA DIEZ (and husband, PANCRI DIEZ), 07-CV-5352 (AKH) Plaintiffs, NOTICE OF ADOPTION BY **MAYORE ESTATES LLC, 80** -against-LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES 80 LAFAYETTE ASSOCIATES LLC, ET AL., LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS Defendants. TENANTS IN COMMON OF

PLEASE TAKE NOTICE that defendants MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON for the building located at 22 Cortlandt Street (Subcellar Floors 1, 2, 3, and Floors 1, 2, 3) New York, New York 10007, (hereinafter "Mayore Estates/80 Lafayette"), as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Mayore Estates/80 Lafayette's Answers to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

ANSWER TO MASTER

**COMPLAINT** 

WHEREFORE, Mayore Estates/80 Lafayette demands judgment dismissing the above-captioned action as against them, together with their costs and disbursements.

Dated: New York, New York September 11, 2007

## HARRIS BEACH PLLC

Attorneys for Defendants
MAYORE ESTATES LLC, and
80 LAFAYETTE ASSOCIATES LLC

/s/
Stanley Goos, Esq. (SG 7062)
100 Wall Street, 23<sup>rd</sup> Floor
New York, New York 10005
(212) 687-0100

TO:

Paul Napoli, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

## Liaison Counsel for Plaintiffs

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6<sup>th</sup> Floor
Newark, New Jersey 07102

Thomas Egan, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza New York, New York 10006

## Liaison Counsel for the Defendants

All Other Defense Counsel

## **CERTIFICATION AS TO SERVICE**

The undersigned certifies that on September 11, 2007, I caused the following document to be electronically via the Court's ECF system:

 Notice of Mayore Estates/80 Lafayette's Adoption of Answer to Master Complaint.

The undersigned further certifies that on September 11, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

Paul Napoli, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Liaison Counsel for Plaintiffs

Dated: September 11, 2007

James E. Tyrrell, Esq. Joseph Hopkins, Esq. Patton Boggs LLP One Riverfront Plaza, 6<sup>th</sup> Floor Newark, New Jersey 07102

Thomas Egan, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza New York, New York 10006

Liaison Counsel for the Defendants

/s/	
Stanley Goos, Esq. (SG 7062)	